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Remarks

Reconsideration of the above-captioned application is respectfully requested. Claims 25-29 and 32-36 (of which Claims 25 and 32 are independent) have been rejected under 35 U.S.C. §102 as being anticipated by Reed et al., USPN 5,548,866, Claims 32-36 have been rejected as being anticipated by Briar, USPN 4,200,236, and various dependent claims have been rejected under 35 U.S.C. §103 as being obvious over one of the primary references in view of Nelson, USPN 4,730,786.

The Office Action evidently reads "engaged with" appropo of the manifold and handle in Claim 25 as meaning "no matter how much intervening structure exists between the manifold and handle" and thus, as reading on Reed et al. In Reed et al., the relied-upon handle assembly 30 is pivotably engaged with a base frame assembly 60 at journals 640R, 640L, col. 5, lines 43-48, not to the element 656 of Reed et al. (used as the recited manifold). The relied-upon element 656 in Reed et al. is spaced from the handle assembly 30. In contrast, amended independent Claim 25 requires the jet manifold to be engaged with a lower end portion of the handle without intervening structure between the manifold and handle as shown in, e.g., Figure 3 of the present application. On the other hand, independent Claim 32 as now amended requires the manifold to be fixedly engaged with the handle, whereas, as mentioned above, the handle assembly 30 of Reed et al. is pivotably engaged with the base frame assembly 60 (which holds the relied-upon manifold).

It has also been alleged that the Venturi effect is "inherent" in Reed et al. However, Claim 25 does not recite "Venturi effect" in a vacuum, but rather as resulting from the cooperation of the wings. Elements 646, 644, and 616 in Reed et al. have been used as teachings of the wings, but it does not appear that these elements cooperate to produce a Venturi effect, nor does the allegation in the Office Action about the Venturi effect being inherent in Reed et al. mention the relied-upon "wing" elements of Reed et al. Similarly, it has

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not been shown that air outside the jet manifold of Reed et al. between the relied-upon "wings" and a surface being cleaned and air from behind the relied-upon "rear wing" is entrained into water being sprayed from the nozzles onto the surface, thereby facilitating cleaning the surface with both the water and the air, as recited in Claim 32.

Turning to the rejection of Claim 32 based on Briar, as now amended Claim 32 recites a unitary rear wing as shown in Figure 3 extending from the jet manifold rearwardly of the nozzles and terminating in a rear transverse edge without further structure rearwardly of the rear transverse edge that is closer to the ground during operation than the rear wing. In contrast, in Briar the combination of structure that has been relied on as the "rear wing" (top wall 11 with base plate 24 for a wheel caster) is not unitary (the base plate 24 is screwed to the front wall 12, col. 2, lines 38-40) and in any case the bristles 9 plainly are rearwardly of and closer to the ground during operation than the relied-upon "rear wing".

Moreover, owing to the above difference in structure it does not appear that Briar's relied-upon wings cooperate as recited in the last clause of Claim 32. In fact, the relied-upon structure cannot seem to so function, because intervening structure such as the bristles 9 and pipe 40 would appear to disrupt the cooperation of structure required by the claims.

Applicant's previous arguments are incorporated herein for preservation in the event of an appeal.

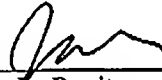
The Examiner is cordially invited to telephone the undersigned at (619) 338-8075 for any reason which would advance the instant application to allowance.

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